

# United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

V.

CRIMINAL COMPLAINT

Edith FUENTES

Case Number: M-21- 951 -M

YOB: 1998

COC: United States

United States District Court  
 Southern District of Texas  
 FILED

MAY 03 2021

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about May 3, 2021 in STARR County, in the Southern District of Texas defendant(s) did,

Nathan Ochsher, Clerk

knowing or in reckless disregard of the fact that K.B.S. and E.B.S., citizens of Mexico, have come to, entered, or remain in the United States in violation of law, transports, or moves or attempts to transport or move such aliens within the United States from a location in the Roma, Texas Port of Entry to a location in Rio Grande City, Texas, in furtherance of such violation of law and brought the aliens for the purpose of commercial advantage or private financial gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)  
 I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

On May 3, 2021, Edith FUENTES, a United States citizen, arrived via vehicle at the Roma, Texas Port of Entry to make entry to the United States from Mexico and attempted to transport into the United States through the Roma, Texas Port of Entry two undocumented alien minors (female, age 11 and female, age 6), actual Mexican Citizens, presenting them as United States citizens with two Texas birth certificates, through means of document false statement. In order to deceive United States Customs and Border Protection officers, the defendant presented two Texas birth certificates bearing the names M.L.R., date of birth 02/04/2009 and E.N.G., date of birth 10/18/2016, at vehicle primary lane. The defendant and accompanying minors were referred to secondary and, during secondary inspection, the defendant freely admitted that she attempted to smuggle the minors, with true identities K.B.S. and E.B.S., into the United States, from the Roma, Texas Port of Entry to Rio Grande City, Texas, by presenting two Texas birth certificates while knowing that K.B.S. and E.B.S. were undocumented alien minors. The defendant further stated that she knew that K.B.S. and E.B.S. did not have legal status to be in or enter the United States, but the defendant admitted to having agreed to transport K.B.S. and E.B.S. into the United States for private financial gain. The defendant intended on using the Texas birth certificates to further K.B.S.'s and E.B.S.'s illegal entry into the United States.

Continued on the attached sheet and made a part of this complaint:

☐ Yes

☒ No

Approved By AUSA: **Peter Brostowin**

Submitted by reliable electronic means, sworn to & attested to telephonically per Fed.R.Cr.P. 4.1, & probable cause found on

May 3, 2021 at 6:26 PM

Date

**J. Scott Hacker**

**U.S. Magistrate Judge**

Name and Title of Judicial Officer

s/ Alejandro Peña

Signature of Complainant

**Alejandro Peña**

**CBPO-Enforcement**

Printed Name of Complainant

**McAllen, Texas**

City and State

Signature of Judicial Officer